

THE HONORABLE RICHARD A. JONES

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

and,

MARIA CRUZ CONTRERAS and SOFIA
VERA RODRIGUEZ,

Plaintiff-Intervenors,

v.

GIPHX10, LLC d/b/a "HAWTHORN
SUITES BY WYNDHAM," and
JAFFER, INC.,

Defendants.

CIVIL ACTION NO.
2:20-cv-01369-RAJ-BAT

PLAINTIFF EEOC JOINS IN PLAINTIFF-
INTERVENORS' OPPOSITION TO
DEFENDANTS' MOTION TO MODIFY
CASE SCHEDULE ORDER WITH
RESPECT TO DISPOSITIVE MOTIONS
DEADLINE

Plaintiff EEOC hereby joins in Plaintiff-Intervenors' Opposition to Defendants' Motion to Modify Case Schedule Order with Respect to Dispositive Motions Deadline [Dkt # 51], filed on May 25, 2022. For the reasons set forth in greater detail in Plaintiff-Intervenors' Opposition [Dkt #51] and the Declaration of Sean M. Phelan in support thereof [Dkt. #52], Defendants have not provided any evidence of good cause as required by Fed. R. Civ. P. 16(b) to modify the deadline for dispositive motions and this Court should deny Defendants' motion to Amend the Pretrial Order with respect to the deadline for dispositive motions and *Daubert* motions. To be

PLAINTIFF EEOC JOINS IN PLAINTIFF-INTERVENORS'
OPPOSITION TO DEFENDANTS' MOTION TO MODIFY CASE
SCHEDULE ORDER WITH RESPECT TO DISPOSITIVE
MOTIONS DEADLINE

EEOC et al v. GIPHX10, LLC d/b/a "Hawthorn Suites by Wyndham"
et al

2:20-cv-01369-RAJ-BAT - Page 1

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
909 FIRST AVE., SUITE 400
SEATTLE, WASHINGTON 98104
PHONE (206) 220-6884
FAX (206) 220-6911
TDD (206) 220-6882

1 clear, the EEOC agrees that this Court should grant the agreed motion to extend the mediation
2 deadline to June 10, 2022.

3 Respectfully submitted this 25th day of May 2022.

4
5 ROBERTA STEELE
Regional Attorney

CHRISTOPHER LAGE
Deputy General Counsel

6 DAMIEN A. LEE
7 Supervisory Trial Attorney

GWENDOLYN YOUNG REAMS
Associate General Counsel

8 CARMEN FLORES
9 Senior Trial Attorney

Office of the General Counsel
131 M Street, N.E.
Washington, D.C. 20507

10 BY: /s/ Carmen Flores

11 Carmen Flores
12 Senior Trial Attorney
13 Seattle Field Office
14 909 1st Avenue, Suite 400
15 Seattle, Washington 98104-1061
Telephone (206) 576-3035
Facsimile (206) 576-3035
carmen.flores@eeoc.gov

16 Attorneys for Plaintiff EEOC
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

DATED this 25th day of May 2022

/s/ Rebecca Eaton

REBECCA EATON

Paralegal Specialist

Equal Employment Opportunity Commission

909 First Ave., Suite 400

Seattle, Washington 98104

Telephone: 206-576-3028

Fax: 206-220-6911

Email: rebecca.eaton@eeoc.gov

PLAINTIFF EEOC JOINS IN PLAINTIFF-INTERVENORS'
OPPOSITION TO DEFENDANTS' MOTION TO MODIFY CASE
SCHEDULE ORDER WITH RESPECT TO DISPOSITIVE
MOTIONS DEADLINE

EEOC et al v. GIPHX10, LLC d/b/a "Hawthorn Suites by Wyndham"
et al

2:20-cv-01369-RAJ-BAT - Page 3

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
909 FIRST AVE., SUITE 400
SEATTLE, WASHINGTON 98104
PHONE (206) 220-6884
FAX (206) 220-6911
TDD (206) 220-6882